

EXHIBIT

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF ANDRES DE LA ROSA

I, Andres De La Rosa, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based upon my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached herein as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. At the time of these horrific terrorist attacks, I worked as a Busser for the New York Marriott World Trade Center Hotel (Marriott), which was located within 3 World Trade Center. Attached as Exhibit B to this Declaration is a true and correct copy of a letter from the New York Marriott World Trade Center Hotel confirming my employment on September 11, 2001.

4. I arrived at the Marriott for work in the early morning hours of 9/11. I was eating breakfast in the basement cafeteria when I heard a loud explosion. Startled by the explosion, I ran out of the cafeteria so that I could escape from the Marriott Hotel and the area. When I arrived outside of the cafeteria, I saw complete chaos inside of the Marriott. As I attempted to run from the area and out of the building, I fell to the ground and I was knocked unconscious.

5. When I later awoke, I was laying in the street outside of 3 World Trade Center and I was trampled by people trying to escape from the World Trade Center area. As a result of being trampled, I suffered injuries to my back, shoulder, both hips, and both legs. Despite my injuries, I managed to get to my feet and stumble away from the area before the World Trade Center Towers collapsed. EMS personnel then transported me to a local hospital for care and treatment.

6. As a result of these terrorist attacks, I suffered the following specific physical injuries on September 11, 2001: a closed head injury that led to the loss of consciousness; migraines; lower back pain with bulging discs at the L5/S1 and L3/L4 levels; bilateral knee injuries, including torn meniscus in the left knee; right shoulder pain with decreased range of motion; and leg cramps. Due to my physical and emotional pain caused by these terrorist attacks, I attempted suicide one week after the events of 9/11.

7. I further suffered and continue to suffer from severe emotional distress as a result of these terrorist attacks. The horrific events that I witnessed on 9/11 directly caused all of the above conditions, which continue to this day.

8. I sought and continue to seek medical attention on a monthly basis for my injuries caused by these terrorist attacks. Attached as Exhibit C to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I received for my physical and emotional injuries following the September 11, 2001 terrorist attacks.

9. I previously pursued a claim through the September 11th Victim Compensation Fund (VCF 0001820) specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 9 day of June 2021.


Declarant Andres De La Rosa

**EXHIBITS
FILED
UNDER SEAL
(ECF No.
5716)**